

# **EXHIBIT 2**

**AFFIDAVIT OF CUSTODIAN OF RECORDS****CUSTODIAN OF RECORDS FOR:**

Priority Physical Therapy  
1853 East Maple Road, Troy, MI 48083



Records Pertain to: Naha Hamchou  
Date of Birth: May 30, 1970  
Other Identification: XXX-XX-8396  
Records being sought: SEE ATTACHED

I, , being first duly sworn, do hereby certify that I am the Records Custodian of Priority Physical Therapy located at 1853 East Maple Road, Troy, MI 48083.

I have custody of all records of Naha Hamchou. The attached documents are true and complete copies of said records. The attached records are true, accurate and complete duplicates of the acts, events, conditions, opinions, or diagnoses described, made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters. These records were kept in the course of a regularly conducted business activity, and it was regular practice of the business activity to make the records.

\_\_\_\_\_ I have produced all of the records responsive to the subpoena and/or authorization no records have been withheld or removed.

The records indicated below have not been provided due to the selected reason.

Records Requested	Never Existed	Destroyed/Purged	Lost	Retention Policy & Other Explanations
Medical	X	□	□	
Billing	X	□	□	
X-Rays/Films	X	□	□	
Employment	X	□	□	
Payroll	X	□	□	
Insurance	X	□	□	
Other				

I hereby declare under penalty of perjury under the laws of the State of Michigan, that the foregoing is true and correct.

Executed on: 7 July 2022 at: Palmyra, MD  
Date City and State

Samantha Rhoderick SIGNED Samantha Rhoderick  
Print Name Signature of Custodian of Records

## UNITED STATES DISTRICT COURT

for the

## EASTERN DISTRICT SOUTHERN DIVISION DISTRICT OF MICHIGAN

Naha Hamchou	)	
<i>Plaintiff</i>	)	
v.	)	Civil Action No. 2:22-CV-10115-PDB-CI
Luis Garcia and Martinez Produce & Seafo...	)	
<i>Defendant</i>	)	

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

Priority Physical Therapy, 1853 East Maple Road, Troy, MI 48083  
 To: \_\_\_\_\_ Ph: (248) 509-7135

(Name of person to whom this subpoena is directed)

**Production:** YOU ARE COMMANDED to produce at the time, date and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

**Continued on Attachment.**

Place:	Date and Time:
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**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 04/15/2022

*CLERK OF COURT*

OR

/S/ Timothy Jordan

*Signature of Clerk or Deputy Clerk*

*Attorney's signature*

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) Luis Garcia and Martinez Produce & Seafood, Inc., who issues or requests this subpoena, are:  
 Timothy Jordan - 1155 Brewery Park Boulevard, Suite 200, Detroit, MI 48207 Phone: (800) 875-1530  
 Email:

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Attachment

Any and all documents, paper, digital, records pertaining to care, treatment and examination, including but not limited to, all office, emergency room, inpatient/outpatient charts, a breakdown of x-ray films, to include MRI's, CAT scans, etc and imaging on cd, any and all records of payment and/or discount regarding any medical billing as well as the bills themselves, billing information, including but not limited to statements, computer printouts, itemized breakdown of all charges, payments, adjustments/write-offs or balance due, and the sources of each, all EOBs from any insurance carrier reflecting any and all credits and adjustments and write-offs to the bills by virtue of any payments and/or contractual agreements/adjustments, including fees, etc. for professional services including Medicare, Medicaid, etc., pertaining to Naha Hamchou, DOB May 30, 1970, with SS# XXX-XX-8396, including all electronic communications from and to the patient, from any and all dates.

Pertaining to Naha Hamchou, DOB 05/30/1970: SSN: XXX-XX-8396